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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON EDWARD THOMAS CARDIFF,

Defendant.

No. 5:23-CR-00021-JGB

**OPPOSITION TO JASON CARDIFF'S EX
PARTE APPLICATION FOR AN ORDER
EXTENDING INTERNATIONAL TRAVEL AND
RETURNING HIS PASSPORT**

Plaintiff United States of America, by and through its counsel
of record, the Consumer Protection Branch of the Department of
Justice and Trial Attorney Manu J. Sebastian, and the United States
Attorney for the Central District of California and Assistant United

1 States Attorney Valerie L. Makarewicz, oppose the *ex parte*
2 application for an order extending international travel and return of
3 defendant's passport made by defendant, Jason Edward Thomas Cardiff,
4 for the same reasons as identified in its previous oppositions. [Dkt.
5 # 33, 89-90, 104, and 123].

6 In addition, defendant's new claim that a medical professional
7 has prohibited his travel back to the United States should not be
8 trusted without substantiation. Defendant has repeatedly misquoted
9 sources and transcripts throughout his filings and declarations and
10 has made a number of dishonest statements to the Court. Defendant
11 neglects to provide any evidence from an actual medical professional.
12 Defendant also requests that the Court allow him to remove his
13 electronic monitoring device during his extended stay in Ireland.
14 Defendant previously attempted to have his electronic monitoring
15 device removed, which this Court denied. Law enforcement will not be
16 able to locate the defendant without the electronic monitoring device
17 if he fails to return to the United States. Thirty days without
18 monitoring gives the defendant ample time to flee to a country that
19 will not extradite him and provides him enough time to obscure his
20 trail so that law enforcement cannot find him.

21 Accordingly, the government requests the Court deny the
22 defendant's *ex parte* application for an order extending international
23 travel and return of defendant's passport.

Dated: November 15, 2024

Respectfully submitted,

AMANDA N. LISKAMM
Director
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United States Attorney

/s/

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